

## MODERN SLAVERY REPORT

2022

### WHO WE ARE

Foot Locker, Inc. (the “Company”) leads the celebration of sneaker and youth culture around the globe through a portfolio of brands, including Foot Locker, Kids Foot Locker, Champs Sports, Eastbay, atmos, WSS, Footaction, and Sidestep, including 2,858 operated stores, as well as websites and mobile apps, in 28 countries across North America, Europe, Asia, Australia, and New Zealand, in addition to 142 licensed stores in the Middle East and Asia.

### PRIVATE LABEL

The vast majority of products sold by the Company come from our branded suppliers. Only a small percentage of our products are sourced directly by the Company. We have a factory inspection system in place to monitor and ensure compliance with our Global Sourcing Guidelines and applicable laws.

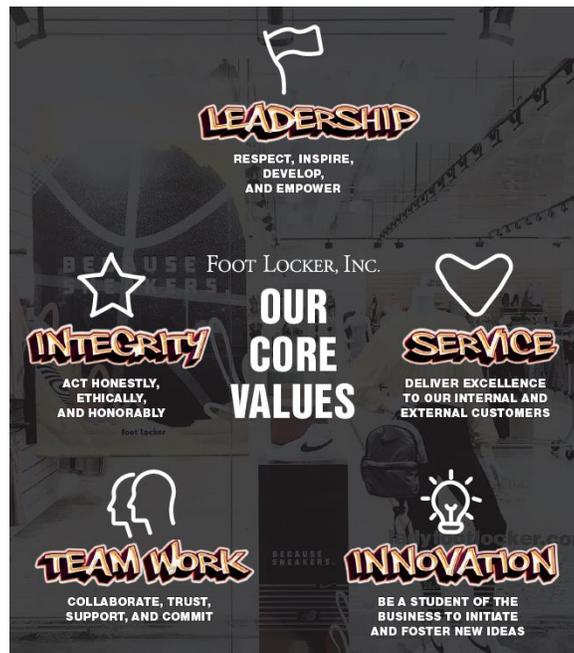
### UNITED KINGDOM

In the United Kingdom, the Company operates its business through Freedom Sportsline Ltd., with over 60 retail stores under the Foot Locker and Kids Foot Locker banners, and through the Internet channel [footlocker.co.uk](http://footlocker.co.uk).

### POLICIES

### OUR CORE VALUES

We strive to operate in accordance with our five core values:



Our commitment to conducting business honestly and ethically extends to the selection of suppliers within our supply chain.

## **CODE OF BUSINESS CONDUCT**

Our core values are captured in our Code of Business Conduct (“COBC”). The COBC serves as our play book. It provides us with the standards that guide our work and how we demonstrate leadership with each other, our customers, our business partners, and our competitors. It is an important resource that provides information on what behaviors are expected from each of us, as well as guidance on where to go for help and details on certain risk areas. The COBC is applicable to all team members working at the Company.

## **ANTI-CORRUPTION POLICY**

The Company is committed to conducting its business in an honest and ethical manner. We are committed to complying with all anti-corruption and bribery laws, including the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act.

## **CONFLICT MINERALS POLICY**

The Company is committed to maintaining a socially responsible supply chain and to sourcing components and materials from companies that share our values regarding human rights, ethics, and environmental responsibility. The use in the Company’s products of “conflict minerals” from the Democratic Republic of Congo or an adjoining country that finances armed conflict would be inconsistent with this commitment. Conflict minerals are defined as tin, tantalum, tungsten and gold (commonly referred to as 3T&G), regardless of where they are sourced, processed or sold (“Conflict Minerals”). Conflict Minerals can make their way into the supply chains of various products used by consumers and businesses around the world. The Company strives to use only materials in the Company’s sourced products that do not finance armed conflict, and we will work within our supply chain to take steps to comply with the U.S. Conflict Minerals requirements.

## **GLOBAL SOURCING GUIDELINES**

Without a sound commitment to human rights and implementation through due diligence, jobs can be precarious, compensation can be below a living wage, and individuals can be subjected to modern day slavery, among a range of other potential impacts. Therefore, we have policies, processes, and practices in place to systematize our human rights approach and how we respond to serious allegations. This is a public good for all stakeholders.

Our Global Sourcing Guidelines require all of our suppliers to respect certain employment standards that we believe should be universal, notwithstanding more relaxed standards (if any) imposed by law. In the selection of our suppliers, we work hard to choose reputable business partners who are committed to our ethical standards and business practices. The Global Sourcing Guidelines are distributed annually to each of our suppliers and each supplier agrees that, by accepting orders from us, it will abide by and implement its terms and require the same from each of its subcontractors. Each of our suppliers acknowledges that its failure to honor these guidelines will compel us to reevaluate, and possibly terminate, our business relationship with them. The Global Sourcing Guidelines are an integral part of our purchase agreements with suppliers, and to assure conformity with the Global Sourcing Guidelines, we reserve the right to make periodic, unannounced inspections of their facilities, and suppliers agree to maintain and provide upon request all documentation necessary to demonstrate compliance.

Our Global Sourcing Guidelines provide the following:

<b>Standard</b>	<b>Policy</b>
Employment	We will only do business with suppliers whose workers are, in all cases, present voluntarily, compensated fairly, allowed the right of free association, and who are not put at risk of physical harm, discriminated against, or exploited in any way. For additional information regarding our commitment to human rights, see our Global Human Rights Statement available at <a href="https://investors.footlocker-inc.com/humanrights">investors.footlocker-inc.com/humanrights</a> .
Child Labor	Child labor is not permissible.
Forced Labor	Forced labor, whether in the form of prison labor, involuntary or slave labor (including human trafficking), indentured labor, bonded labor, or otherwise is not permissible. Employment must always be on a voluntary basis.
Wages and Benefits	We will only deal with suppliers who compensate their employees fairly by providing wages, overtime premiums, and benefits that, at the very least, comply with legally-mandated minimum standards.
Working Hours	We will only deal with suppliers who maintain reasonable work hours, not exceeding prevailing local standards, or any maximum prescribed by applicable laws.
Health and Safety	We will only deal with suppliers who provide their employees with a safe and healthy work environment, designed to prevent accidents and injury to health arising out of or occurring in the course of work. At a minimum, we require that suppliers comply with all applicable, legally-mandated standards for workplace health and safety. For additional information regarding our commitment to health and safety, see our Global Occupational Health and Safety Statement available at <a href="https://investors.footlocker-inc.com/safety">investors.footlocker-inc.com/safety</a> .
Nondiscrimination	We believe that employment should be based on ability and not on belief or any other personal characteristics. We will only deal with suppliers who do not practice discrimination in employment, including in hiring, salary, benefits, advancement, discipline, termination, retirement, or in other aspects of employment on the basis of race, color, nationality, ethnic origin, gender, religion, age, sexual orientation, disability, or similar factors.
Harassment and Abuse	We expect all employees to be treated with respect and dignity. We will not deal with suppliers whose employees are subjected to physical, sexual, psychological, or verbal harassment or abuse.
Freedom of Association	We expect all of our suppliers to grant their employees the right to choose to affiliate with legally-sanctioned organizations or associations without interference.
Subcontracting	Our suppliers may not utilize subcontractors to manufacture our products without our prior written approval and only after the subcontractor has agreed to comply with the Global Sourcing Guidelines.

The Company periodically reviews the guidelines and revises them, as appropriate. The Global Sourcing Guidelines are available at [investors.footlocker-inc.com/gsg](https://investors.footlocker-inc.com/gsg).

## **WHAT DO WE DO?**

- The Company conducts regular social compliance audits for direct suppliers of private label product on an annual basis. During the social compliance audit, a verified third party evaluates the factory on compliance in forced labor, child labor, wages and working hours, harassment and discipline, health and safety, freedom of association, discrimination, sub-contracting, and basic environmental standards. Auditors evaluate compliance with these standards through document review, worker and management interviews and factory tours. Auditors are trained in identifying potential risks of forced labor or human trafficking.
- The Company reserves the right to make periodic, unannounced inspections of our private label suppliers' facilities to verify compliance with our Global Sourcing Guidelines and other requirements. Such on-site inspections are conducted by our internal team or by a third-party company.
- Suppliers agree to maintain and provide, upon request, all documentation necessary to demonstrate and to assure compliance.
- In recent years, we have taken steps to consolidate our supplier base so that we are working more closely with fewer suppliers to deepen our partnerships to forge a more collaborative approach grounded in continuous engagement and improvement.

## **SOCIAL COMPLIANCE DUE DILIGENCE**

The Company's efforts include setting policies and operating guidelines for suppliers, identifying risks to workers health and safety through social compliance audits, and by participating in industry groups that collaborate to set policies and approaches to social and environmental risks within the supply chain, such as Retail Industry Leaders Association.

## **SECURITY COMPLIANCE DUE DILIGENCE**

The Company continues its partnership with U.S. Customs & Border Protection in the area of border security and is a validated member of Customs-Trade Partnership Against Terrorism ("CTPAT").

Each supplier is responsible for the security of the merchandise, and we expect each supplier to take the necessary steps to assure all shipments of merchandise to the Company are secure and do not contain contraband or other illegal materials.

The Company continues its partnership with Dutch Customs and U.S. Customs & Border Protection in the area of border security and international trade control. The Company is a validated member of CTPAT in the United States and Authorized Economic Operator in Europe.

## **NON-COMPLIANCE**

When non-compliance is identified during an audit, the Company partners with the supplier to develop and implement an improvement plan for the facility. The outlined corrective actions must be taken by the supplier to remediate the issue. The Company works with factory management to ensure they properly address issues which present a risk to the supply chain.

In some cases, the Company will require a follow-up audit within the same year to return to the factory and re-evaluate records after corrective actions have been taken.

The Company reserves the right to terminate the relationship with any supplier who fails to comply with our Guidelines.